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July 23, 2021

By Fax ((914) 390-4179)

Hon. Nelson S. Román
United States District Judge
U.S. District Court, Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: Hernandez v. Ross Aviation Operations, LLC, Case No. 7:21-cv-3902-NSR

Dear Judge Román:

This firm represents defendant Ross Aviation Operations, LLC (“Ross”) in the above-referenced matter. We write pursuant to Section 1.E. of Your Honor’s Individual Practices in Civil Cases to request an extension of time for Ross to respond to Plaintiff’s Complaint.

Ross’s response to Plaintiff’s Complaint was due on July 16, 2021. There have been no previous requests for an extension. The reason for the instant request is twofold: because Ross only recently became aware of Plaintiff’s service of the Complaint on the Secretary of State, and to allow the parties time to explore a resolution of the underlying dispute before expending further resources on litigation. Plaintiff’s counsel consents to the instant request, as reflected by the signed stipulation enclosed with this correspondence.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/Adam Friedland

Adam Friedland

ADF

cc: Jon A. Stockman, Esq. (via email)

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHRISTOPHER HERNANDEZ,

Plaintiff,

v.

ROSS AVIATION OPERATIONS, LLC
a/k/a ROSS AVIATION OPERATIONS LLC

Defendant.

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: CIVIL ACTION NO. 07:21-cv-03902-NSR
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: **STIPULATION**
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Plaintiff and Defendant, through their respective undersigned counsel, hereby agree that the time for Defendant to answer or move in response to the Complaint shall be extended until September 20, 2021. Defendant waives any defenses related to service of the Summons and Complaint.

**THE LAW OFFICE OF JON A.
STOCKMAN**

BY: *Jon A. Stockman* 7/22/2021
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SO ORDERED